



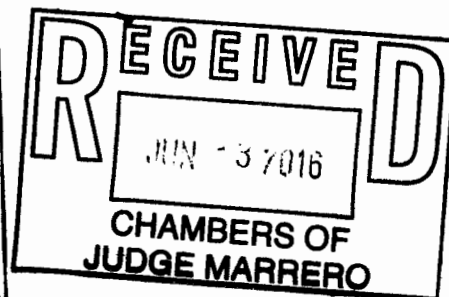
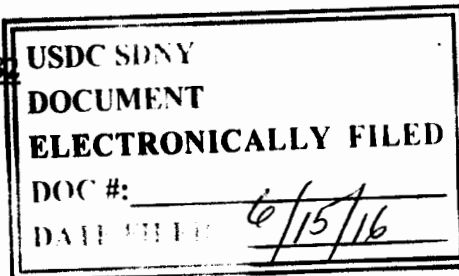
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June 13, 2016

BY FACSIMILE (212) 805-6382

Hon. Victor Marrero
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street, Suite 660
New York, NY 10007



Re: MHS Capital LLC, et al v. Keith Goggin, et al., Case No. 1:16-cv-01794-VM

Dear Judge Marrero:

This firm represents plaintiffs. We write to effectuate the remand contemplated by this Court's June 13, 2016 Decision and Order (the "Order"). The Order states:

For the reasons stated below, upon its review of the Proposed Amended Complaint, the Court is persuaded that, as modified, Plaintiffs' claims do not arise in or under the Bankruptcy Action. Accordingly, the Court will grant Plaintiffs leave to file their Proposed Amended Complaint and thereafter to move for remand on the basis of the Proposed Amended Complaint. Should Plaintiffs file such motion, the Court anticipates, also based on the reasons and analysis stated below, that it will be granted.

Id. at 2-3; *see also id.* at 5 & 14.

As contemplated by the Order, plaintiffs filed their Proposed Amended Complaint today. In accordance with Individual Practice Rule II.A, plaintiffs hereby move to remand this action to New York Supreme Court, New York County, for the reasons set forth in the Order, along with such other or further relief as the Court deems just and proper.

Respectfully submitted

Stanley S. Arkin

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